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April 15, 2025

Via ECF

Hon. Mark W. Pedersen
United States Magistrate Judge
100 State Street
Rochester, New York 14614

Re: *Singleton v. The City of Geneva et al.*, 23-cv-06359-EAW-MJP

Dear Judge Pederson:

We represent the Plaintiffs in the above-captioned action and write to respectfully request an extension of time to identify expert witnesses. Plaintiff's expert witness identification is currently due April 17, 2025 and Defendants' is due May 16, 2025. Plaintiff respectfully requests that his expert witness identification be due June 1, 2025 and that Defendants' expert witness identification be due July 1, 2025.

Plaintiff brought the instant action for injuries he sustained when he was wrongfully prosecuted and imprisoned by Defendants the City of Geneva ("City") and Detective Steven Vine ("Vine"). Specifically, he alleges causes of actions under 42 U.S.C. § 1983 (prosecution without probable cause and due process violations against Vine); state law (intentional and/or negligent infliction of emotional distress and malicious prosecution against Defendants, and negligent hiring, screening, retention, supervision, and training and *Monell* claims against the City); and the state constitution (violation of Article I, § 12 against Defendants).

Based on the nature of the instant action, Plaintiff is only looking to hire a police practices expert and needs to complete Defendants' depositions, including those of City employees with knowledge of the underlying claim, before deciding whether such an expert is necessary. The parties are currently working on scheduling depositions. Additionally, this amendment to the discovery schedule would not impact the current discovery deadline, which is July 14, 2025.

Plaintiff discussed this request for an extension of time with Defendants, who indicated their consent.

We thank the Court for considering this request.

Respectfully,

/s/

Sara Wolkensdorfer